



John Schmidt  
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To: Linda Meyer/R10/USEPA/US@EPA  
cc:  
Subject: FMC pond closure comments

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FF/4C  
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Linda Meyer  
U.S. Environmental Protection Agency Region 10  
1200 Sixth Avenue (WCM-121)  
Seattle, WA 98101

Re: Pond Closure plans for FMC, Pocatello

Linda,

On behalf of the Eastern Idaho group of the Sierra Club, I am submitting the following comments on EPA's plans for closure of ponds 18a, 18b and 17 at FMC's Pocatello, ID facility.

First I'd like to state that information on this issue was difficult to find. If it was on EPA's web site, I couldn't find it. Lack of information has made it difficult to offer more detailed comments. EPA should make better use of its web site to allow for citizens to become more involved in these types of issues.

This pond-closure process is a departure from the initial plan as outlined in the Consent Decree. FMC was originally required to remove and treat all materials in these ponds, and the fact that EPA is allowing this drastic change in plans is quite disturbing. EPA has allowed FMC to buy their way out of properly cleaning up their mess here in Pocatello and it leaves future residents of this area to deal with poor decision-making by EPA.

We are concerned about the pond closure process and we expect EPA to require continuous monitoring for phosphine, hydrogen-cyanide and all other potential hazardous emissions from the ponds as they are being closed.

Once the ponds are closed and capped, we expect that continuous monitoring of the caps and berms of ponds 18a, 18b, and 17 be conducted.

We are also concerned about ground water monitoring. There is a 30-year limit under RCRA for ground water monitoring and due to the nature of elemental phosphorous, we feel this is not adequate. We request that EPA include some options in this plan that will require ground water monitoring to extend beyond the 30-year time period if future monitoring shows evidence of contamination from these ponds in the ground water.

We are concerned about releases of hazardous emissions from this facility and we feel that monitoring at the pond perimeter is not sufficient.

We request continuous monitoring at the fenceline of the facility to ensure that health and safety of the public is protected.

We also request that monitoring data be made available to the public via EPA's web site as it becomes available. This would give the public the opportunity to see for itself if the closure plan is working and if there are ongoing threats to public health from this facility.

Sincerely,



John Schmidt, chair  
Eastern Idaho Group  
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